

Howard & Howard Attorneys, PLLC

1 **CONF**
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 AMERICAN ALTERNATIVE INSURANCE
CORPORATION, a Delaware corporation

Case Number 21-cv-00586-GMN-NJK

11 Plaintiff,

12 vs.

**CONFESSION OF JUDGMENT
(AFTER INITIATION OF SUIT)**

13 BT SUPPLIES WEST, INC., a Nevada
corporation

14 Defendant.
15

16 Defendant BT SUPPLIES WEST, INC., individually (hereinafter "Defendant") does
17 hereby confess judgment in favor of AMERICAN ALTERNATIVE INSURANCE
18 CORPORATION, a Delaware corporation (hereinafter "Plaintiff") for the sum of ONE
19 MILLION DOLLARS (\$1,000,000) (the "Debt"). The unpaid Debt shall bear interest at the
20 legal rate of prime plus two percent (5.25%) (the "Rate").
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1 Defendant authorizes judgment to be entered against it for the full amount of the
2 forgoing sum. This Confession of Judgment is for an indebtedness justly due and owing to
3 Plaintiff pursuant to the terms of a Settlement Agreement dated December ____, 2021.

4 Defendant shall tender One Million United States Dollars (\$1,000,000) with an initial
5 payment of One Hundred Thousand Dollars (\$100,000) upon execution of the Mutual Release
6 and Settlement Agreement with the balance of Nine Hundred Thousand Dollars (\$900,000)
7 paid in monthly installments of not less than Fifty Thousand Dollars (\$50,000) due on the first
8 day of each month beginning January 1, 2022 and continuing thereafter until paid in full by no
9 later than September 30, 2022.

10 This Confession of Judgment is made and entered into upon the condition that no
11 execution shall issue hereon, nor shall this Confession of Judgment be filed with the Clerk of
12 the above-entitled Court if said Debt is fully satisfied in accordance with the terms and
13 conditions herein.

14 Any payments made by Defendant hereunder shall be credited against the Debt.

15 The indebtedness referenced herein may be prepaid, in whole or in part, at any time
16 without penalty.

17 The acceptance of any payments less than the amount due on a given date shall not be a
18 waiver of Plaintiff's right to (i) obtain an ex-parte judgment against Defendant, (ii) execute on
19 the judgment, or (iii) otherwise proceed as provided herein.

20 The ex parte judgment entered hereunder shall include interest at the Rate from April
21 09, 2021 forward, and actual attorney's fees and costs.

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1 The above payment schedule may only be modified by a written agreement between the
2 parties.

3 In the event of Defendant's default in the performance of the terms herein specified
4 (more than ¹⁵ ~~five~~ [5] calendar days late in making any payment required herein), this Confession
5 of Judgment may be filed and entered with the Clerk of the above-entitled Court, and Plaintiff
6 shall be entitled to exercise its full rights to enforce and collect the balance then due on said
7 Debt in any lawful manner, together with interest stated herein, any and all additional attorneys
8 fees, plus all Court fees and costs incurred. Plaintiff shall also be entitled to a late fee equal to
9 ten percent (10%) of any payment that is more than five (5) days late. *Need written notice of*
default

10 If Defendant shall be late in making two (2) or more payments hereunder, the Plaintiff
11 may, at its option, declare the balance immediately due Plaintiff and ask the Court to enter
12 judgment as provided herein whether or not Defendant has cured the default.

13 Defendant has read this Confession of Judgment (Prior to Suit), and hereby agrees to its
14 terms. Defendant confesses that this debt is justly due. Defendant further confesses that it has
15 no substantive or procedural defense to this Confession and that it was executed under its own
16 volition and not under any duress or coercion or anything other than its free will.

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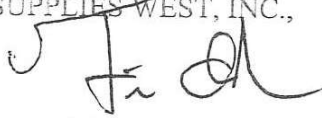
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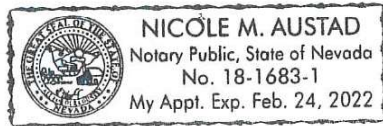
1 Defendant also confesses that it has had time to seek counsel of his own choosing to review this
2 confession of judgment and has no defenses whether now known or unknown.

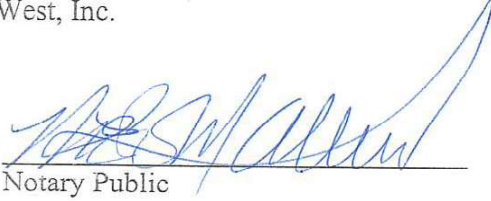
3 BT SUPPLIES WEST, INC.,

4 
5 By Tzvi Odzer

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7 STATE OF NEVADA)
8)SS
9 COUNTY OF CLARK)

10 This instrument was acknowledged before me on this 29 day of December, 2021 by Tzvi
11 Odzer as president of BT Supplies, West, Inc.



15 
16 Notary Public

17 **IT IS SO ORDERED.**

18 Dated this 19 day of October, 2022

19 
20 Gloria M. Navarro, District Judge
21 UNITED STATES DISTRICT COURT
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